

ATTACHMENT 2



"Christian Wickwire"
<CWickwire@charlsonbredehof.com>

06/19/2006 12:11 PM

To <DRegal@hnrlaw.com>

"Elaine Bredehoft" <ebredehoft@charlsonbredehoft.com>,
cc "Jessica Bogo" <jbogo@charlsonbredehoft.com>,
<mhodgson@steptoe.com>, <dclark@steptoe.com>,
bcc

Subject 1:00 Meet and Confer

History: This message has been replied to and forwarded.

Due to (1) the numerous filings by Defendants late in the day Friday and this morning, which include emergency motions and expedited briefing schedules, (2) the most recent order by Judge Lancaster, and (3) the short time-frame to respond, we are no longer available for today's 1:00 meet and confer. A cancelled deposition has freed up some time tomorrow in the late morning, and we are still available in the afternoon as well. Please let me know when you are available tomorrow and we can hold our meet and confer at that time.

Thank you for your understanding.

-Christian Wickwire

S. Christian Wickwire

Charlson Bredehoft & Cohen, P.C.
11260 Roger Bacon Drive, Suite 201
Reston, VA 20190
T: (703) 318-6800
F: (703) 318-6808
E-mail: cwickwire@cbc-law.com

-----Original Message-----

From: DRegal@hnrlaw.com [mailto:DRegal@hnrlaw.com]

Sent: Monday, June 19, 2006 7:34 AM

To: Michael_Palus@pawd.uscourts.gov

Cc: Elaine Bredehoft; Christian Wickwire; Jessica Bogo; mhodgson@steptoe.com;
dclark@steptoe.com; rmay@hnrlaw.com

Subject: Letter to Judge Lancaster


Please see the attached letter to Judge Lancaster and attachments thereto.

Dorothea W. Regal
HOGUET NEWMAN & REGAL, LLP
10 East 40th Street
New York, New York 10016

Tel. (212) 689-8808
Fax (212) 689-5101
dregal@hnrlaw.com

Randi May/Hoguet Newman
Regal

06/19/2006 12:51 PM

To "Christian Wickwire" <CWickwire@charlsonbredehoft.com>
dclark@steptoe.com, DRegal@hnrlaw.com, "Elaine
Bredehoft" <ebredehoft@charlsonbredehoft.com>, "Jessica
Bogo" <jbogo@charlsonbredehoft.com>,
bcc
Subject Re: 1:00 Meet and Confer 

Christian,

We can be available tomorrow at noon for the meet and confer on the issues raised in your June 15, 2006 letter.

However, we see no reason why we cannot have the meet and confer concerning Dr. Gold's report today at 1 pm. First, the call should take no longer than 5 minutes - we simply need to know if you will be bringing the report into compliance with Rule 26 or not. As you know, we first requested that meet and confer last Wednesday and wanted to discuss it last Thursday. We also asked for a complaint report by this Thursday, June 22. We accommodated your request by agreeing to wait until Monday for a meet and confer and do not want to delay this matter any further.

The filings on Friday should not prevent you from finding 5 minutes to discuss Dr. Gold's report with us: 1) The only filing by Defendants this morning (to the court in Pittsburgh) does not require any action on plaintiff's part, since the Court ruled later in the morning; 2) the recent order by Lancaster does not require any action except to arrange service of the order on the PNC bank; and 3) defendants are unaware of any "short time frame to respond" that Plaintiffs are concerned about other than the expedited briefing Defendants requested in the filing with Judge Penn, and that expedited time frame is necessitated by Plaintiff's motions to quash and the nature of the Florida court's response thereto.

Accordingly, please let me know as soon as possible of you will be available at 1, or as soon thereafter as possible, for a brief meet and confer on Dr. Gold's report.

Thank you,

Randi

Randi B. May
Hoguet Newman & Regal, LLP
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New York, NY 10016

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